

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA, MIAMI DIVISION**
Case No. 1:23-md-03076-KMM

IN RE:

**FTX Cryptocurrency Exchange Collapse
Litigation**

THIS DOCUMENT RELATES TO:

O’Keefe v. Sequoia Capital Operations, LLC, et al.,
Case No. 23-cv-20700 (S.D. Fla.)

O’Keefe v. Temasek Holdings (Private) Limited, et al.,
Case No. 1:23-cv-23065 (S.D. Fla.)

*Chernyavsky, et al. v. Temasek Holdings (Private)
Limited, et al.*, Case No. 1:23-cv-22960 (S.D. Fla.)

*Cabo, et al. v. Temasek Holdings (Private) Limited, et
al.*, Case No. 1:23-cv-23212 (S.D. Fla.)

**DECLARATION OF ANDREW J. EHRLICH IN SUPPORT OF THE
MULTINATIONAL VC DEFENDANTS’ OPPOSITION TO PLAINTIFFS’ MOTION TO
AMEND**

I, Andrew J. Ehrlich, under penalty of perjury, declare as follows:

1. I am a Partner at the firm Paul, Weiss, Rifkind, Wharton & Garrison LLP, which represents Temasek Holdings (Private) Limited (“Temasek Holdings”) and Temasek International (USA) LLC (“Temasek USA,” and together with Temasek Holdings, “Temasek”) in this action. I respectfully submit this Declaration in support of the Multinational VC Defendants’ Opposition to Plaintiffs’ Motion to Amend.

2. In connection with the Court’s ordered limited jurisdictional discovery, Temasek collected documents from custodians who encompassed the core members of the Artz Fund Investments Pte. Ltd.’s FTX deal team: Pradyumna Agrawal, Antony Lewis, and Chen Sijia.

3. The following search terms were then applied to the collected documents: (SBF or “Bankman-Fried” OR “Bankman Fried” OR Friedberg OR Ramnik OR Arora OR (Can w/3 Sun) OR Ellison OR FTX OR Alameda OR “North Dimension” OR “LedgerX”) /20 (met OR meet* OR talk* OR discuss* OR interact* OR call OR called) AND (Florida OR California OR “FL” OR “CA” OR "Cal" OR “FLA” OR “CALI”).

4. These terms pulled in 4,883 documents from the relevant custodians.

5. Counsel for Temasek then reviewed these 4,883 documents for responsiveness to the relevant Request for Productions authorized by the Court (“the RFPs”). *See* ECF No. 478 at 2.

6. My colleague conveyed the information in the foregoing paragraphs to counsel for Plaintiffs. Attached as Exhibit 1 is a true and correct copy of a February 2, 2024 email exchange between Plaintiffs’ counsel and counsel for Temasek.

7. Temasek then produced all documents that were responsive to the RFPs, totaling over 940 pages of produced documents, to Plaintiffs.

8. The responsive documents, Bates stamped THFTXMDL-00000001 - THFTXMDL-00000944, were produced to Plaintiffs by a secure file transfer program on January 25, 2024.

9. Attached as Exhibit 2 is a true and correct copy of a redline showing the proposed changes between the Administrative Complaint (ECF No. 182) and Plaintiffs’ Proposed Amended Complaint (ECF No. 493-1).

10. Attached as Exhibit 3 is a true and correct copy of Plaintiffs’ proposed exhibits to Plaintiffs’ Proposed Amended Complaint, ECF No. 493-1.

I declare under the penalty of perjury under the laws of the United States of America that
the foregoing is true and correct.

Dated: March 14, 2024
New York, New York



Andrew J. Ehrlich